



Second, Defendant Chetsford possesses discoverable information. Defendant Chetsford's identity is not only critical but absolutely necessary to the case to learn more details about the manner by which the Trump Defendants secured his services, the amount Defendant Chetsford was paid to maliciously defame Plaintiff, whether Defendant Chetsford has engaged in other such paid malicious attacks on the character and reputation of others<sup>3</sup> to evidence a pattern of habitual conduct,<sup>4</sup> whether there were other parties involved who may be civilly liable as well, and to develop the evidentiary record for trial.

Third, as Plaintiff has previously stated, Plaintiff wishes to secure Defendant Chetsford's cooperation against the Trump Defendants in the Texas case, which include Donald John Trump, Donald J. Trump for President 2024 Inc., Make America Great Again Inc., Make America Great Again PAC, and Trump Save America Joint Fundraising Committee.

Fourth, as detailed in the footnotes, a malicious and defamatory attack on an individual's biographic background, including the fabrication of documents, is not "political speech."<sup>5</sup> As such, although Plaintiff did lay-out a *prima facie* case for defamation that even satisfies the *New York Times v. Sullivan* standard, it was not necessary for Plaintiff to do so, and Plaintiff's voluntary decision to do so must not be viewed as a concession that the application of such a standard is a concession that this case involves "political speech." Plaintiff only sought to neutralize and

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<sup>3</sup> Plaintiff asks this Court to take judicial notice of the fact that this was not political speech. This was a malicious defamatory attack on Plaintiff wholly unrelated to any political issue. A malicious defamatory attack on a political person related solely to their biographical background is not "political speech."

<sup>4</sup> This is also the basis for which Plaintiff requests all internet protocol addresses from which Defendant Chetsford has logged onto his Wikipedia account, which Plaintiff asks this Court to take judicial notice of. This is not an ordinary footnote. It is the intent of Plaintiff, *pro se*, that the Court take judicial notice of this.

<sup>5</sup> Defendant Wikimedia Foundation would have this Court believe that any speech directed toward a political opponent is "political speech," including knowing and malicious lies about that person. Malicious and defamatory attacks does not qualify as "political speech," which the U.S. Supreme Court already made clear in *New York Times v. Sullivan*. It gets no protection.

completely obliterate any and all defenses raised by Defendant Chetsford regardless of their validity.

Lastly, Fed. R. Civ. P. 8(d)(3) explicitly stated that a “party may state as many separate claims or defenses as it has, *regardless of consistency*.” Plaintiff is expressly permitted by the Federal Rules of Civil Procedure to make as many inconsistent claims as needed. What is true is that there is an injury that Plaintiff is petitioning the judiciary to redress in accordance with his First Amendment rights. Plaintiff seeks the truth behind these malicious and defamatory attacks. Defendant Chetsford possesses information relevant to the pursuit of the truth, and his identity must be revealed.

Respectfully submitted,

Dated: December 1, 2023.

By: /s/ John Anthony Castro

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#### **CERTIFICATE OF SERVICE**

On December 1, 2023, I electronically filed the foregoing document via the Court’s CM/ECF system. It is further certified that all other parties are CM/ECF users and that service of this document will be made upon them via CM/ECF.

/s/ John Anthony Castro  
John Anthony Castro